Nancy P. Kahanak 17725 Clear Water Rd Fayetteville, Arkansas 72703 21 Oct. 1990 EPA AIR DOCKET Dear Mr. Reilly, I am very much opposed to the EPA's approving "Hi Tec 3000." This additive is at best an unknown, and at worst a highly dangerous substance contains poisonous elements. My husband and I wige the EPA NOT TO APPROVE Hi Tec 3000. Sincerely, Many Kaharak

Colleen Becker General Delivery James Store, Virginia 23080

October 19, 1990

I am writing this letter to ask you to complete the proposed cancellation un addition, bleade immediated carbolizan's begintiation, it dearly spaced an immement tagard and initiates sections to bom liquid application. Thank you for your consideration

10 10 10 10 W

Mrs. Teri Bellows 2277 Pine Ave. Ronkonkoma, NY 11779

OCT 3/6 22-90

Dear administrator Reilly,
along with fellow staff and
students, & suncerely urge you do
deny Ethyl Coup's depolication for
the Jec 3000, with its doxic
additive, manganese. We have
whachened the earth unough
and owe it do our children to
conoceed with a safe, effective
cleanup. I'm not howing this
que to the upcoming deadline for
your decision. Please avoid
more losses to ourselves & our world,
say no to Ethyl. My Cleare world East

OCT 3 | 1590

Washington D.C.

I read that the Ethyl Corporation is asking the EPA to approve a new gasoline additive called "Hitech 3000."

Considering that if approved, enormous guartities of manganese will be released into own entrouncent. In view of the known to kicity of this metal - and of our state of ignorance abt what other dangers it may present, this additive sounds like a particularly bad idea.

Place work to prevent the approval of this application.

Sincerely,

Dr. Stanley R. MOOVE 410 Plower Ct Matteville, W1 55818

IN FEEDWE OCT 31 1990

Dear Sir, (row) We have the name chance Tip an environental disaster in the bud! DO NOT APPROVE HITEC 3000 It's a joke + a book joke

October 18, 1990 Dear Miter Leiley, as an environmentalist I strongly urge you to deny Ethyl Corporation's application for the Tec 3000," Until it known what the long term effects of manganese in the excuronment bee on human health , & feel it is inverse to sanctify this garoline additive.

329 Down Rd Berlany CT 06525 Oct. 18, 1990

Administrator William K. Reilly E. P. A. 401 M St. S.W. Washington, D.C. 20460

Dean Mr. Reilly: On behalf of all my family REJECT the application of The Ethyl Corporation Anerica for the approval of, E.P.A. for a gasoline addi-Hive, called He Tech 3000. Hi tech 3000, as you know, en a toxic Please don't add to our Credibility of the EPA.

617 N. Wharton Street Sherman, Texas 75090 October 20, 1990

Wm. K. Reilly, Administrator U. S. Environmental Protection Agency 401 M Street, SW Washington, D. C. 20460

Dear Mr. Reilly:

I have been distressed by TV news reports and by information received from the Environmental Defense Fund, which I support, the knowledge that Ethyl Corporation seeks approval of "HiTec 3000," a toxic manganese-based gasoline additive.

As an environmentalist, I deplore the possibility of <u>more</u> toxicity's being added to our atmosphere and urge you as strongly as I know how to deny approval of the application sought for "HiTec 3000."

We need to clean up our environment, not add further contaminants to it.

Sincerely,

Mrs. J. T. Jackson

4623 Hyacinth Street Panama City, FL 32404 October 19, 1990

Mr. William K. Reilly EPA Administrator 401 M Street, SW Washington, DC 20460

Dear Mr. Reilly,

I would urge you to reject the application of Ethyl Corporation to be allowed to include the toxic manganese-based gasoline additive, HiTec 3000. If it is as toxic as their Lead additive in gasoline, I would urge you to reconsider its use. I would also ask that testing be done prior to the additive being released to public use.

Thank you for your time.

Sincerely,

Juanita Dial

RAYMOND, COLESAR, GLASPY & HUSS, PC

5413 Patterson Avenue • Suite 100 • Richmond, Virginia 23226 • 804/285-4905 • Fax 804/285-9447 Robert R. Raymond 804/285-4990 • William E. Colesar, Jr. • Archie Glaspy, Jr. • Philip A. Huss 804/285-4937

October 18, 1990

William K. Reilly Administrator Environmental Protection Agency 401 M Street, SW Washington, DC 20460

Dear Administrator Reilly:

As an environmentalist and an active member of the Environmental Defence Fund, I strongly urge you to deny Ethyl Corporation's application for "HiTec 3000," a toxic manganese-based gasoline additive.

Sincerely,

Robert R. Raymond

5631 Shank Rd. A-90-16 Vanta Ohio 45418 (let. 19,1990 administrator William & Reilly Environmental Protection Agency 401 m Street, SW Washington, DC 20460 Near Mr. Reilly I vorite to urge your assistance in your position as Environmental Trotection director en denyeng to the Ethyl Corporation of Comercia their request for approval of the openhine additione Hi Jech 3000. We have already then victions in the just of this same company's scheme To market leaded agas and hand suffered immensurably as a result. Mo mire! Profit at the expense of line lost or damaged is too high a grade to juy end the American citizens will not, and should not, pay it. Men reserver reveals a virtual lead foresoning efedernio army om nation's children More, In the pake it's own jerofit Ethyl Confination I again ready to just our environment and public Lealth of Cereine rick. I am counting for you to stank firmly against such an attempt. Succeedy Koherta Fourt

4056 Esperanza Drive Sacramento, CA 95864 October 20, 1990

William K. Reilly Environmental Protection Agency 401 M Street, SW Washington, DC 20460

Dear Mr. Reilly:

I understand the Ethyl Corporation of America is asking the EPA to approve HiTec 300, a gasoline additive. Furthermore I understand that little data is known about the effects of this substance. I am concerned that use of this additive can be toxic when released into the atmosphere in the quantities created by the driving public. Until the public can be assured that HiTec 3000 is not another pollutant, please defer use of this substance.

Sincerely yours,

Morris G. Jerome

3594 Crestview Avenue Lebanon OH 45036-1006 October 20, 1990

Mr. William K. Reilly Adminstrator, EPA 401 M Street, SW Washington, D.C.

Dear Sir:

As a concerned environmentalist and an active taxpayer, I strongly urge you to deny Ethyl Corporation's application for "Hi Tec 3000," a toxic manganese-based gasoline additive.

Thank you for your kind attention.

Sincerely,

Kathyn B B Sheppard

(Mrs. Clark Q. Sheppard)

64-02 A 192 nd st. Flushing, NY 11365 Oct. 20, 1990

Administrator William K. Reilly Environmental Protection Agency 401 m street, Sw Washington, D.C. 20460

Dear Sin:

Corportion's request to permit the additive "HiTec 3000" to pasoline.
In 1925, Ethyl gave us tetraethyl lead in our fuel. What a disaster that was! Again, the same company is claiming it has another miracle for us. It will take another miracle years down the road to undo the major damage "HiTec 300" will cause; our environment and human beings will suffer because of the manganese released into our atmosphere. Please don't let this hoppen.

Sincerely Mina Rection Environmental Protection Agency 401 M Street 3W Washington DC 20460 Washington DC 20460 Attn: Mr William K Reilly

RE: Ethyl Corporation's application for Hi Lee 3000"

October 23, 1990

Dear Mr (Keilly,

Jt will take years to class up our already

polluted environment. Do not Compound the

problem by allowing Ethyl Corporation to

problem by allowing Ethyl Corporation to

introduce large quantities of manganese

into our atmosphere as well. The long-term

effects of this gasoline additive are sunknown

effects of this passence is a toxic

and unstudied however, it is logical to

beauty metal, however, it is logical to

beauty metal in the

assume large amounts of this metal in the

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assume large amounts of the large amounts of the larg

Sincluly, Catherine S. Rodriguez October 16, 1990

William K. Reilly, EPA Administrator Environmental Protection Agency 401 M Street, S.W. Washington, D.C. 20460

Dear Mr. Reilly:

I recently requested and received literature from the Ethyl Corporation regarding their product HiTec 3000.

My question to you is what is your reaction and position on this product and does the product perform as stated in their literature.

I anxiously await your reply.

Sincerely

Louis F. Hart

11 Rambler Street

Bristol, CT. 06010

ETHYL CORPORATION

330 SOUTH FOURTH STREET

POST OFFICE BOX 2189

RICHMOND, VIRGINIA 23217

October 12, 1990

Lou Hart 11 Rambler Street Bristol, CT 06010

Dear Mr. Hart:

Thank you for your recent inquiry requesting additional information on HiTEC 3000 performance additive, a fuel additive that will help reduce significantly harmful automobile emissions in the air.

We at Ethyl Corporation are pleased that we can make a contribution toward reducing air pollution. On May 9, 1990, we asked the Environmental Protection Agency (EPA) to approve our product for use in gasoline.

For the last two years, Ethyl Corporation has been conducting the most extensive series of driving tests ever performed on a gasoline additive. The test program involved a 48-car fleet driving more than 3 million miles.

The results show that HiTEC 3000 additive, a manganese-based octane improver, can reduce significantly overall tailpipe emissions, including nitrogen oxides, one of the most harmful pollutants and a major component of urban smog. The additive allows refiners to reduce their reliance on toxic aromatics such as benzene, to boost the octane rating of gasoline and to extend fuel efficiency. Use of the additive would save about 82,000 barrels of imported crude oil a day, or 30 million barrels a year. Since 1978, Canadians have driven more than 400 billion miles on gasoline containing HiTEC 3000 additive with no harmful effects to the environment.

Enclosed is a brochure with more detailed information on HiTEC 3000 performance additive. After reading the brochure, if you would like to express support for the fuel additive, please write to EPA Administrator William K. Reilly at the Environmental Protection Agency, 401 M Street, S.W., Washington, D.C. 20460.

The EPA has until early November to reach a decision. Again, thank you for your interest.

Sincerely,

Deborah Shepperson

A-90-,

Roger G. Fuelster 746 S. Scoville Avenue Oak Park, Illinois 60304

October 19, 1990

WILLIAM K. REILLY, ADMINISTRATOR Environmental Protection Agency 401 M Street, SW Washington, DC 20460

Dear Mr. Reilly,

Please note my vehement opposition to approval of Ethyl Corporation's new and supposedly safe HiTec3000 gasoline additive.

We can no longer afford to release known toxic compounds into our environment. Years ago, when the spaces were greater, and the people fewer, we were able to get away with the concept of pollute and dilute. Now we are paying the price of that short-sighted policy.

PCBs contaminate our waters, and we are told not to eat fish taken from these lakes and streams. Chemicals poured down coalmine air vents in Pennsylvania are leaching into water supplies, and the Love Canal debacle needs no further comment. Lead concentrations next to roads and highways are high, and are a direct result of the gasoline additive (tetra-ethyl-lead) that was supplied by Ethyl Corporation of America.

Manganese is also a heavy metal, and is known to cause neurological problems at relatively small doses. Like other heavy metals, it accumulates in the body.

We no longer have the luxury of the "pollute and dilute" approach to toxic compounds. Deny Ethyl Corporation's application for HiTec3000.

Sincerely,

Roger S. Fuelster

A-90-16

Robert B. Randolph f.O. Box 2779 Herced, OA 95344

October 20, 1990

William K. Reilly EPA administration

Dear Bill Reilly,

Please agase cese of Ethyl Corporationes new MMT addetive. The product Clearly represents a strines health hazard without significant benefits.

Sincèrely, Bob Randolph

Dear Commitvator Raily. the new a deadline date for approval of the Corporations toru manganese brief gasobie additive "H. Tec 3000". be required to prove the saltet of the additione De level with Seal in the air for years and never really got red of it's proven domaging composels until it balds ceptho calality converters needed prother enviormental for theires. Him I assume they still Hopey you two down down Vellace Mulsen: Weller N. Knussen Road Kathryn Road Siver Spring, Md. 20004 Malt Disney Production

10-20-90

Administrator William K. Reilly Environmental Protection Agency 401 M St SW Washington DC 20460

Dear Mr. Reilly,

The Ethyl Corporation's application, to start the whole Leaded-Gas fiasco over again with Manganesed "HiTec 3000" Gas with MMT, is a travesty. You know Manganese is poisonous to humans, you know how impossible it will be to ever remove the Lead that Leaded Gasoline spewed into our lives, yet this company proposes to do it to us again, walk off with the profits, and leave you and I with the cost of trying to make our part of the planet a decent place to live again. This government and your Agency already has a reputation for protecting Corporate America more than it protects the environment. Don't make it worse. Please Keep Manganese out of our Gasoline and out of our Lives.

Sincerely

James A. Buss

Box 31526

Seattle WA 98103

10/20/90

William K. Heilly Administrator - T E. P. A.

Dear Mr. Reilly --

I strongly unge you to deny

Ethyl Corporation's application for

"HiTec 3000", a Toxic monganese-based

"HiTec 3000", a Toxic monganese-based

g asoline additive, It'll be easien

to do now than trying to get it out

to do now than trying to get it out

of own anvironment in 20 years if

of own anvironment in 20 years if

it takes hold The way lead did.

Sincerely David Shore

ESTERNING HARMAN

5762 Vicente St.
Oakland CA
94609

10.22.90

Dear Administrator Restly,

It is with waterest urgency that I implore you to dany Ethyl Corporations request for EPA approval of their new gasolnie additive "HTec 3000". It is my understanding that thus additive contains toxic amounts Is warganese, a havy metal Known to produce symptoms of Vankinson's Disease. My grandmother died of

AGPT I

2 149 E

Parkensons Disease 91-06-1 , a slow and famful death. I dread that I could be prone to the same. Our environment is already overflowing with toxicity, with alarming increases in our populations debititated by cancer, environmental Muesses, immune déficiencés We must all-particularly influential people like yourself, be thinking about our future gener-ations, our children + grandchildren and not the selfish denies of for profit, heedless' corporations. Thankynfor listering, Betry Reeves

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اردان دردان در دردان در RECENTED America the Beautiful

thator William K Reilly Environmental Protection agency Ho! "M" Street, S.W. Washington, D.C. 20460

10/22/90

Dear administrator Reilly, as environmentalists and active members of the Environmental Defense Fund, we strongly urge you to dany Ethyl Conjunctions application for "He Tec 3000" a topic mangarese - based gasdine additive.

Sincerely, Elinor y. Robie

bow & sended lotremarium and piscopment P.O. Box 411, Bradford . N.H. 03221



A-90-16

DCT 31. 2019 1990	•
Dear Mi Relly	
you must repeat Ethyl Corporation's	
application to produce MMT da a	
gastin ariting be rarly have an	
opportunity to apply the lesson of 50	
year of experiment. Nour we do	
don't make the same mitale that	
was more with lead I care about	
my hutth and that of my children.	
don't you are about your?	
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Sincely	
Lyany - Wing Com	
	·
1 Wood on & Care	
Mandolph, W 07869	

Mr. and Mrs. Alfred A. Hatab 36 Howard Park Drive Tenafly, New Jersey 07670 OCHOBEN 19 1990

administrator William K. Reilly Environmental Probection Aginey 401 M Street S.W. washington D.C. 20460 OCT 3 | 1990 pear Mr. Reilly: add our voices of profest (to your finde agency against the attempts of Ethyl Corp. to add Hi tee 3000 to its gasoline. (We ve had enough problems over the years unth lead poisoning I that additive, we have found out will release wavganese into the well be evel = outred or Angela Hara

JUL 3 1 1001

MRS. PHILIP L. COOK 558 AIR FORCE VILLAGE 4917 RAVENSWOOD DR. SAN ANTONIO, TX 78227

22 Oct 90

Mr. William K. Reilly Administrator, EPA 401 M Street Washington, D.C.

Dear Sir:

Please do not give the Ethyl Corp. permission to market the additive HiTec 3000 which is extremely dangerous to humans.

We have enough poisons being released into the air already without this manganese product.

Sincerely yours,

Methanica M. Cook

60131

Wilma Thompson 905 Beacon St. Boston, Massachusetts 02215

Oct. 18, 1990

Dear Me. Reilly:

Dear Me. Reilly:

Dear Mont to add my voice to the 22

Who care protecting the drive of the

Who care protecting to add "Hitle 3000"

Ethyl Componition to add "Hitle 3000"

to ite gesoline. This is the same

to ite gesoline. This is the same

componition beaded gesoline, a contributing of

Lead poisoning to millione of children.

This supposed by "self" addition

will release mangeness unto the ain

will release mangeness unto the ain

a heavy metal already known to be

dangerous.

Samperous.

daministration in the way of concernfor

administration in the way of concernfor

the well-being of the people but &

dare to hear for one small bit of he

avidence that such concern will be

evidence that such concern will be

shown by your agency. Sincerely,

Wilma Thompson

S·E·I·U STEWARD 473 F. D. R. Drive, #806 New YORK, NY 10002 October 20,1990

STEWARD Admin. William K. Reilly Environmental Protection Agency 401 M Street, SW Washington, D.C. 20460

Dear Mr. Reilly,

It has come to my attention that the

Ethyl Corporation has brought an application to you.

They want permission to use an additive,

il, manganese, in their gasoline.

I strongly urge you to reject this

application:

The release of mangenese into the

environment and into the lungs of

my grandchildren, and all the people

who live in crowded cities, will be

extremely dangerous.

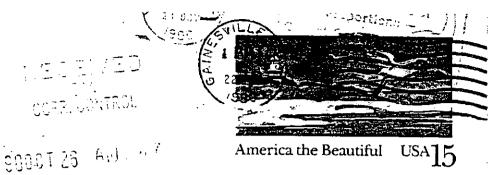
Please reject this application!

We have more than enough air pollu
tion right now!

Sincerely,

\$ 2572-2500

Mrs. Netter Shrog



3 | 1990

Hr. William K. Reilly Das 401 H Street, SW Washington, DC 20460

Dear Sir, Please = do not approve Ethyi Corporation's gasoline additive, "HiTec 3000." It wheases mangarese into the environment, whose larg-term effects on human realth are intirain. Sincerely, Gina B. Hardin



20 October 1990

Give a firm "NO" to
Ethyl Corporation, and an immediate
suspension of all currently permitted
use of MMT as a gasoline additive to
avoid a repeat of our country's exposure to another heavy metal.

bout the irreversable effects of manganese. Yet Ethyl Corporations toxicity argument for its "HiTec 3000" is the same as used in 1925 for its tetraethyl lead, the use of which has made lead poisoning epidemic among our children; and we are now confronted with cleaning up the lead residue in playgrounds, backyards, and roadsides.

rificant public health achievement has been the removal of lad fixings soline. Keep it that way with a resounding "NO" to Ethyl Corporation and its shameless effort to lure public and Administration into believing its product is safe.

Singerely,

Jenevieve Letis

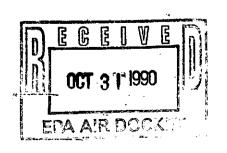
A-90-1

JOHN H FOLKEMED 1900 1392 West Vaplar Feet Jox, PA 17404-3436



William K. Keillay Environmental Protection Agency Show My Street, S.W. Bashington, D.C. 20460

220ct.90 Dear Mr. Reilly, Iam writing to simply express strong Support for the approval of HITEC 3000 performance additive. In light of Operation Desert Shields the Budget impasses the lenvironmentalissues involved, National Security, and the Hagic Duffet deficit national debt, isn't it time for tiTEC 3000, Thank you for your consideration. Sinceral, this tollows



Redmond 421 Hillview Ln. Billings SMt : 59101

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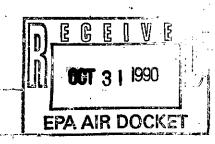
57791 3000125 F3 33

Wm. K Reilly E.PA administrator 401 m Street Sa' Washington SC 20460

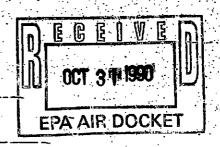
Sir: Ettel Carporation a resucet for approud of adding Hese 3000 Cor mangaxese) of adding Hese 3000 Cor mangaxese) de gossline. Unedo knaw its topic. Occumulation data is unknawn, which makes it even mare dengeracio. After makes it even mare dengeracio. After finally "alttingthe leadout", it is finally "alttingthe leadout", it is finally to approve more additions. Deneminal, of approval.

BET 3 1 1990

Carmend Redmond. 421 Hillier W La. Billing, Mt 59101



How can we arior a Country's Reable to be explosed to al Taxic sollectural like mangantes. BRGET MENON STATE places people about politics, يدى يى ك Fatheriai (80 K. D)



1606 Pittafield Lane
Bowie, Ind 20716
08.18,1990
Dear Mr Reilly
now that we are finally
starting to remove one toxic
darting to remove one toxic heavy metal (lead) from our air, we can not afford
our air, we can not afford
to let some company put
another toxic Record metal
(manganese) into the air.
Please say no to the
Ethyl Corporation's "Hi Tech 3000"
additiel.
Thank you
2020153 Janet Musicante
33000
COPR. COLLINS.
• • •

10/18/90

Dear Mr. Reilly:

I urge you to reject
the application of the Ethyl
Corporation for approval of
their gasoline additive called
HiTec 3000.

This product contains
manganese, a toxic heavy
metal. Please do not make
the American people the quienea
pigs to test this product.

Thank you.

Mr. fesse Amold Box 1211 Cambria Ca. 93428

50.0183 VA: 4

Dear Mr. Reilly,

I have recently become aware of the Ethyl corporation's attempt to introduce a new gasoline, HiTec 3000. I am a physician practicing in onio and I don't want to add a new toxin and an entire new spectrum of toxin-caused illness to The list I already treat. I find it as tenishing that Ethyl corporation is even considering the use of another heavy metal additive, manganese. Didn't we do enough harm with lead? Please reject this ludicrous proposal. Burning gasoline is already causing enough environmental damaje without adding manjanese to the Bunt D MSunott, MB insult.

Won K. Reilly administrator EPA

Sih:

F. David Patch 3654 Lott ST. Endwell, NY

HITEC 3000" Srom Ethyl Corporation

Of america. It is my understanden

that you are the findy on whether

Ethyl Corp. has do monstrated that

Hell product is harmfull to people,

aminula and plants.

Please be consumative in

Insure sufficient data has been collected. Please send me acopy of

data submitted,

J. David Patch

Rona L. Stein 227 East Churchill Street Baltimore, MD 21230

22 October 1990

William K. Reilly, Administrator United States Environmental Protection Agency Washington, DC 20460

Dear Administrator Reilly,

As an environmentalist and a Pediatrician, I strongly urge you to deny Ethyl Corporation's application for "HiTec 3000," a toxic manganese-based gasoline additive.

I work with children from an inner city Baltimore neighborhood, where there is a very high incidence of lead poisoning. The lead paint is only part of the problem. The dirt in their yard and parks has been contaminated by 50 years of lead fallout from car emissions. Almost every child I see has a blood lead level once thought to be "safe," and now known to cause learning and behavior problems. As usual, the children suffer most from adults' mistakes. But ultimately, it is society that suffers.

We have the opportunity of prevent another catastrophe. Reject this new application and immediately suspend all currently permitted use of manganese as a gasoline additive.

Sincerely,

Rona L. Stein, M.D.

A-90-16

October 20, 1990 3042 Mary Kay Lane Glenview, IL 60025

William K. Reilly Environmental Protection Agency 401 M. Street, SW Washington, D.C. 20460

Dear Mr. Reilly,

I am writing in regard to the Ethyl Corporation of America's seeking of approval for s 3000. As you well know, manganese is a toxic substance that has been linked to Parkinson's disease. While Ethyl Corp. may claim that the substance is safe and environmentally beneficial, previous activity by this company has shown that their regard for public health is minimal. If the EPA allows manganese to be burned into our atmosphere, future generations of diseased Americans will look back on us, and the Bush administration in particular, with remorse. We should be ashamed of ourselves if HiTec 3000 is approved for use. Please see to it that the gasoline additive is banned from use in the United States, or for export. Thank you for your concern for this nation's breathing health.

Sincerely,

Bradley Moldofsky

Bradler Moldofy

Sonaldene G. Mc Huffon 315 Woodard Ovenue Kent, Ohia 44240 Mm. K. Reilly E.P.a. 401 M Street, S. W. Washington, D.C. 20460 Dear Mr. Keilly, I want to hear an November 7th that the J. P. a. under your administration has permanently denied Kthyl Carparation the right to aid DiTec 1:3000, or mithy cyclopentadienyl manganese tricarbonyl, to The third graders in our solval asked such questions) as these of a topic waste chamist: They can't we under the things we've done?" " My do we do this in the first place?" "My can they advertise things without telling people how bad they are?" Sense there graders can detect lying to the public and have some understanding of long-range implications and the limits of human plannings must fulfill the mondate of your position and the Souldine & Mc Huffen

Animal Hospital

of Nesbit Ferry Crossing, Inc.

10-18-90

Dear Mr. Reilly:

Junge you to take heed of Environmental Defense First's warning and reject Ethyl's officetion to use MMT in garoline. Jets avoid the mistake we made with lead so many years ago.

Senceraly, In John a Cawley Administrator Nilliam K. Reilly Anirronmental Protestin agency 401 m Street, S.W. Washington, S. C. 20460

Sear Mr. Reilly,

He understand they Corporation wents to market a gasoline additive containing manganese. That is something we object to namely a heavy metal additive.

The are hoping for an automobile fuel other than gasoline in the near future.

Thank you for your attention.

Mr. + Mrs. Leoge Blumenkamp

1424 1/0.6 4h Sheboygan WI 53081

administrator Wm K. Beilly Environmental Protection agency 401 M. Street, S.W Washington, DC 20460

Dear Mr. Reilly?

Os an environmentalist and mother of three children who need to grow up in a pafe world, I stangly urge you to deny Ethyl Corporation's application for "Hi Tec 3000" a topic manganese-based gasoline additive

> Sincèrely Jacqueline Gruenke

William K. Reilly Environmental Protection Agency 401 M. St. SW Washington, DC 20460

October 18, 1990

Dear Administrator Reilly,

I urge you to reject the Ethyl Corporation's application for approval of HiTec 3000. I am persuaded by the arguments of the Environmental Defense Fund that we know far too little about the health and environmental effects of manganese. The parallel to our disaster with lead-based additives is too striking to be ignored. I am not persuaded by Ethyl that their additive poses no danger.

Whatever HiTec 3000 does (besides generate profits for Ethyl), it can't be so important that you have to approve it <u>now</u>. Please deny the application, and don't consider it again until we know what we are doing. EPA can always approve this additive in the future, should we have good evidence that its use will not add harmful levels of manganese to our air and soil.

Sincerely,

Harley Cahen
937 1/2 E. State St.

Ithaca NY 14850

A-90-16

William A Rice 2241 South Seneca Alliance, OH 44601 October 19, 1990

William K. Reilly, Administrator E P A 401 M St. SW , Washington DC 20460 Dear Mr. Reilly,

Ethyl Corporation's HiTec 3000 should not pass now !!

It may be that careful, neutral, and honest adequate tests will eventually show it to be safe, but to accept it on what amounts to the unsupported assertion of the manufacturer, and the impressive sound of a totally uninformative buzz word name out of publicity writers would be criminally negligent.

The burden of proof remains with Ethyl, and from that source, after tetraethyl lead, I would believe nothing without completely independent corroboration.

Sincerely and in anger

William ARico-

William A Rice (Retired geology prof)

4508 Oak Hollow Road Chester, Virginia 23831 (804) 751-0279 (H) (804) 273-2357 (W) October 19, 1990

Administrator William K. Reilly Environmental Protection Agency 401 M Street SW Washington, District of Columbia 20460

Re: Ethyl Corporation - HiTec 3000

Dear Mr. Reilly:

I am writing to urge your administration to reject Ethyl Corporation's application to use MMT in their gasoline additive known as HiTec 3000.

It is would be a tragic mistake to allow another non-point source path for toxic heavy metals into the environment. The benefits to be gained do not offset the toxic metal pollution problem which will be created. As professional engineer, I believe Ethyl's claim that the use of MMT will reduce certain exhaust emissions and have a beneficial local or atmospheric effect is unfounded and is simply an attempt to divert attention from the toxic metal risk. Certainly, the way to attack atmospheric pollution from automobiles is to focus on strategies which reduce or eliminate certain emissions without introducing new ones.

Please do me, my family, my state, our country, our world, yourself and Ethyl Corporation a favor by rejecting the application for use of MMT.

Sincerely yours,

John W. Grubbs, Jr., P.E.

25740 Carnel Knows Dr. Carnel, CA. 93923

October 19, 1990

William K. Reilly administrator of the EPA Washington D. - 20460

Dear Sir,

I strongly object, as do my might and children, to the sproposal and raqual of the Ethyl Corporation to add a manganese based octave improves to gasoline.

We urge you to dany this applications.

Gragg L. McKee Col. VSA. Retried 19 October 1990

William K. Reilly, Administrator Environmental Protection Agency 401 M Street, SW Washington, DC 20460

Dear Administrator Reilly:

re: Gasoline additive "Hi-Tec 3000":

I am writing to urge you to withhold EPA approval from the gasoline additive "Hi-Tec 3000." Another toxic heavy metal additive in gasoline will not solve our problems of pollution, wasted resources, and dependence on foreign oil sources. Manganese could easily prove to be as dangerous to human health as lead proved to be. Do we have the right to turn another generation of American children into guines pigs, in order to test the safety of long-term exposure to yet another heavy metal? Surely we do not have such a right, and the EPA therefore should withhold its approval from the additive "Hi-Tec 3000.

Thank you for your consideration.

Yours truly,

Isabelle Byrnes

1147 Nielsen Court, Apartment 4

abelle Byrnes

Ann Arbor, Michigan 48105

Caminitator William K. Leilly Enveroumental Protection Regency 401 M Dt. 5W Verlington, D.C. 20460 Wear Der Clacke chief to what I seed the Ethyl Creek. of Cantrick is arrang year to a posterne a new addition to garofue called "Hitze 3000". VI credited with contening marganere, a topic rease me tal Revour to please de cepisto. Recepcia Dous d'incore. Please danc un from any were govofice addition, I said safgrage place man was going to insent theired! thight of We Coelstan. med of the lath, A seemen get Welver to ct. Le need year helt - and thank year.

MRS MAE COX
128 MERION AVE
CONSHOHOCKEN PA 19428
MAD D

29 Affrikachean Thail Road Gardness, Pa 17324 Oct. 19, 1990

EPA 401 M Street, SOV Washington, OC 20460

dear Mr. Reilly: as an environmentalist, I strongly urge you to deny Ethyl Corporation's application for "Hi Tec. 3000 a topic manganese-based gasoline additive,

The simply cannot let Ethyl Corp. put another topic heavy metal additive in gasoline. There's no reason to apen our environment to a new health hazard.

The can't tolerate future unknown clean - up costs when this problem is attogether. preventable today and with your kelp, we won't have to.

Flank you for your kelp.

yours truly, Mrs. Worsean Eaken

PETER B. LOCHTEFELD - CREATIVE ENTERPRISES P.O. BOX 215, PORTSMOUTH, NH 03801, (603) 436-4263

0/18/90

MR REILLY,

I write this to use it manganese based gasoline additinecorporation to use it manganese based gasoline additineManganese is a rosic iterry metal and could cause many
of the same problems that lead caused over somany
years as a gas additine.

Additionally, I want to unce you to support alternatives fine Remsearch AND development, especially According to which is cleaned burning AND throwable AND CAN be domestically produced as well. While we set on the brink of ware trend in the middle last, we could invest as more traction of that money spent on "Desert SHIELD" better the at home on these inputable changes.

Mn. Poter B. Sollet

4503 Radford Avenue N.Hollywood,CA 91607 October 18, 1990

William K. Reilly, Administrator Environmental Protection Agency 401 M Street, SW Washington, DC 20460

Dear Mr. Reilly,

The Ethyl Corporation's product HiTec 3000 will introduce into the atmosphere of our cities large quantities of manganese. I question the wisdom of approving this new and possibly dangerous product at this time and I urge you to deny Ethyl Corporation approval of HiTec 3000.

Sincerely,

Baylis Glascock

William K. Reilly Administrator, Environmental Protection Agency 401 M Street, SW Washington, DC 20460

Dear Administrator Reilly,

It is my understanding that the EPA now has an excellent opportunity to live up to its name.

I am in great hopes that you will be in a position to speak for those of us who have no real voice in the affairs of our government.

The issue to which I refer is the application of Ethyl Corporation to use the gasoline additive it is calling "HiTec 3000."

This additive is manganese-based and it is toxic. We do not need more toxins in the air.

Please deny the application.

Sincerely,

Qudita C. Melson
Judith C. Nelson

7690 Torrem Street La Mesa, California 92042-1818 18 October 1990

Member:

The Nature Conservancy
The Wilderness Society
Greenpeace
Smithsonian Institution
Environmental Defense Fund
National Parks and Conservation Association
National Geographic Society
Sierra Club

October 17, 1990

Mr. William K. Reilly Environmental Protection Agency 401 M Street, S.W. Washington, D.C. 20460

Dear Mr. Reilly,

I am writing in support of the Ethyl Corporation's HiTEC 3000 fuel additive.

I have read with interest the full page newspaper advertising of the product and contacted Ethyl for more information. My question is why such a product has not been used earlier, if indeed it is as good as Ethyl claims.

With all of the public concern regarding the environment today and the need to reduce air pollution, it seems that this product would be a reasonable step to consider. If Canada has been using the product for ten years, we have had ample time for it to be considered.

I hope this is not one of those issues that is being delayed due to a reduction of oil sales by the big companies looking for profits or the government concerned about less tax revenue.

Please send me material which states the other side of the issue and let me know why approval would be denied. As a concerned citizen, I would be in favor of HiTEC 3000 being added to fuel unless you can share specific information as to it's danger to the populace.

Sincerely,

Raymond E. Preas

1317 Careybrook Drive

Richmond, VA 23233

R. E. Orcas

Phone 804 740-0990

CC: Ethyl Corporation - MS Deborah Shepperson

October 17, 1990

Administrator William K. Reilly Environmental Protection Agency Washington, D C 20460

Dear Administrator Reilly:

We have just been alerted to the fact that the Ethyl Corporation wants approval of a gasoline additive called "HiTec 3000". We understand that this addicitve contains manganese, a toxic heavy metal, which if added to gasoline would release into the environment large amounts of manganese. Long-term effects on human health are not known.

After years and years of adding lead to gas which contributed to the chronic lead poisoning of children and adults, we should not take the chance of another poisoning of our population. Our public health needs protection before, not after, the fact.

Please do not approve this additive until and unless it has been proven to be entirely non-toxic.

Thank you for considering my views.

Sincerely,

Ruth Elfstrom Riggles 600 North Wall Street Mount Vernon, WA 98273

of alfbrom Siggles



THE PSYCHOLOGICAL CENTER

34 CONNECTICUT BOULEVARD • EAST HARTFORD, CT. 06108

DOMINIC R. MARINO, PH.D. CLINICAL PSYCHOLOGIST

AREA CODE 203 TEL. 289-6715

October 18, 1990

William K. Reilly Environmental Protection Agency 401 M Street SW Washington, DC 20460

Dear Mr. Reilly:

This letter is to express my strong opposition to the use of Hi Tec 3000 by the Ethyl Corporation. Please deny Ethyl Corporation's application for its use as a gasoline additive.

Thank you for your kind attention.

Sincerely,

Dominic R. Marino, Ph.D.

DRM: ims

Oct. 21, 1990 A-90-16

Mr. William K. Reilly Administrator, EPA, Washington, P.C. 20460

Dear Mr. Reilly: I sincerely hope that

the EPA will dany the Ethyl Corporation's application for Hi Tec 3000

gasoline additive. This material, based on manganese, would like lead.

accomulate in the environment with

potentially tragic consequences. Too little is apparently known about long term, low dosages of exposure to

manganese et is known that high manganese doses are a human neurotoxin with irreversible pathological

effects on brain structure and

in work went and mental Empairments

state.

Sin cerely yours,

Douglas L. Collins
64 Byram Kingwood Rd.

Stockton N.J. 08559

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Environ	natal Prorection Ag	ري درې	
	ron DC 20460		AND TO STORE OF FRANCISCO AND
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Dear r	Ir. Reilly:		The state of the s
I T am	writing to you	in reference to	-le podin
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·	rured by the Et		
HiTec 3	000 contains mang	anese. Please c	ensider that
heavy /	netals such as m	anganese Tend 1	ro be deposited
permane	Thy in the environ	ment. Given T	he known
bounfil	effects of man	gamese in large	doses and
The oak	nown effects of	long Term exposu	re, I feel
it was	ld be unvise T	approve	HiTec 3000
l'ar thi	s rime.		
Sincere	ly.,		
	n diene de de trâns tentre de la company		
Timothy	Anderson		m vario
1725 De	11wood Ave #205	Land that a filtrature and the second se	e service service describe and the service ser
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117 110 11			

P.O. Box 225 Seymour, CT 06483 20 October 1990

Administrator William K. Reilly Environmental Protection AGency 401 M Street, SW Washingotn, DC 20460

Dear Mr. Reilly,

I urge you and the EPA not to allow legislation approving Ethyl Corporation's gasoline additive, "HiTec 3000." Such a potential source of pollution to our already endangered environment should never be permitted by our government.

Thank you.

Sincerely yours,

Samuel R. Peterson

October 20, 1990

William K. Reilly Administrator, EPA Washington, DC

Dear Mr. Reilly:

I strongly urge to reject Ethyl Corporation's Application for use of "HiTec 3000" in gasoline for the sake of our nation's children and their future!!!!!!

Sincerely,

T. L. Wagner

Block Island, Rhode Island

Oct. 19, 1990

Environmental Protection Agency 401 M Street, SW Washington, D.C. 20460

Attn: Mr. William K Reilly, Administrator

Re: Ethyl Corp. "Hi Tec 3000"

Dear Administrator:

I understand that the Ethyl Corporation is petitioning for the right to introduce a new gasoline additive called "Hi Tec 3000" which is the chemical methycyclopentadienyl manganese tricarbonyl (MMT). This proposal alarms me because manganese is toxic at higher doses and like lead may prove to be detrimental to the human population after a period of use.

Please reject this request by the Ethyl Corporation, as it presents us with health risks we cannot afford.

Thank you for you attention in this matter.

Sincerely,

G. Douglas McDowell 13119 N. Florida AVe. Tampa, Florida 33612

(813) 935 6394

A-90-16

10/19/90

Saah Cleyg 1101 Virginia St. Greensboro, NC 27401

William K. Reilly Environmental protection Agency 401 M Street, SW Washington, DC 20460

Dear Mir. Reilly,

Corporation's proposed new gas additive, methylexclopentadienyl Corporation's proposed new gas additive, methylexclopentadienyl manganese tricarbonyl (MMT), as known as HiTec 3000.

Manganese has not had enough research done on it to risk putting it in our air, on our soils, and throughout our environment. The lack of research parallels that of lead in 1925 when it was added to gasoline. We simply do not know how it will affect us as a heavy metal but its history is not a good one. High doses of mangarese are known to the impair mental states. There is not enough research on the consequences of long term "low dose" (an unknown amount relatively) exposure, as an administrator of EPA, please help us protect our fiture while we try to repair our present. "Please to act on the individual letters you are receiving against MMT.

Sincelly

FORTH FORTH

Sixerely, Sarah Clegg Sarah Clegg

. ...<u>--</u>-- .

Administrator Wm. K. Reilly Osar Sur,

21 Oct 90-16

I see that the Ethyl Conferration is asking the EPA for approval for the are of Hi Tic 3000 in gasoline. Bearing in mind its relationship to Parkimon's disease because of the manganese and the Ethyl Conforations behaviour in ignoring the problems with leaded gasoline, I hope you will find it possible to dany their request. We simply cannot make the came mistake twice in allowing a substance where effects are unknown, to be blown out of millions of car exhausts on on unsuspecting public. We must be protected from a repeat.

yours Eucerely

a.a. Whit

Anthony White 277 West Patrick St. Frederick, MD 21701

William A. Leille, Edministrator Environmental Partiction agency Washington, D. C.

Dear Sir:

Traveline additive proposed by the Ethap Corporation. She use of manganese, a topic Reavy metal, presents strong risks of environmental pollution through automobile emissions. The immediate impact and the long range build up of fallont from three emissions demands much more extensive study. It may well be that the manganese risk offsets any purported reductions in other emissions.

Joan Blumenbranz James J. Blumenbranz

> J & J BLUMENKRANZ 7312 Woodrow Wilson Drive Los Angeles, Calif. 90046

A-90-16

Dennis E. Sweitzer Sharon B. Sweitzer 43 S. Sixth St. Oxford, PA 19363 October 19, 1990

William K. Reilly **Environmental Protection Agency** 401 M Street, SW Washington, DC 20460

Dear Mr. Reilly,

As a student of mathematics and statistics, a scientifically literate citizen and soon to be father, I urge you to reject Ethyl Corporations application to sell methycyclopentadienyl manganese tricarbonyl (MMT) as a gasoline additive.

Sixty five years ago our ancestors allowed the use of tetraethyl lead in gasoline on the grounds that lead was only toxic in certain high doses. For fifty years, data accumulated on the low dose toxicity of lead culminating in the prohibition of lead additives. Now you are faced with the choice of allowing manganese as a gasoline additive on the grounds that it is toxic only in high doses, without any evidence that it is not toxic in low dose.

We do know that manganese, at high doses, is a human neurotoxin, with persistent and irreversible effects on the brain. We have evidence that manganese may selectively affect the fetus, the young and the aged. We have evidence that it can alter human DNA, with the resulting potential to cause cancer. We do not know at what level manganese is safe.

On the basis of their ignorance we may forgive our ancestors for poisoning their children with lead. You will not have that excuse if you allow our children to be poisoned by manganese, for in the lack of experimental data, you have the example of our ancestors.

Sincerely,

Dennis E. Sweitzer

Shoron B. Sweitzer

Dear W.K. Reily

As an environmentalist and an active member of the Environmental Desense Fund, I strongly urge you to deny Ethyl Corporation's application for "HiTec 3000," a toxic manganese-based gasoline additive.

Sincerely,
Wichel alafe

for Say 4037

DUNETURE NJ OFFIR

October 22, 1990

William K. Reilly Environmental Protection agency 401 M Street, SW Washington DC 20960

Dear Mr. Reilly:

Please reject Ethyl Corporation's application for "HiTec 3000," a toxic manganese-based gasoline additive.

Have we not learned our lessons from the past? We simply must stop polluting our environment with heavy metals such as lead, manganese, etc. There is no need for us to keep poisoning ourselves!

Sincerely Yours, Elizabeth Cushman 34025 Carl Livonia, Mi. 48152

149 Robin St. Indiana, PA 15701 Cct. 22, 1990

Mr. William K. Reilly Administrator, EPA 401 M Street, S.W. Washington, D.C. 20460

Dear Mr. Reilly:

I urge you not to let the Ethyl Corporation's "HiTec 3000" be approved for a gasoline additive. I am greatly concerned that the release of a heavy notal, in this case manganese, might be harmful, perhaps in this case manganese, might be harmful, perhaps in this case manganese, might be harmful, perhaps in this release would occur in very large quantities. This release would occur in very large quantities.

I believe that no corporation should be allowed to use the entire U.S. population, or even any part of it, as test subjects in a very profitable experiment on chronic exposure to manganese, a heavy metal. I believe that manganese also qualifies for the title Toxic Leave metal.

Toxic heavy metal. Thank you very much.

> Sincetely, Daniel C. Shurely

> > DANIEL C. SHIVELY 149 ROBIN STREET INDIANA, PA 15701

A-90-16 1520 Bryn Mawr Ave.
Racine, WI 53403

administrator W=7K Neilly. EPA 401 M St., SW Washington DC 20460

. Dear fir:

Dotrongly unge gon to deny Ethyl Corporation's application for HiTec 3000, a toxic, monganese-based gasoline additive. Let's be clean! Thank you.

> Sincerely, Month My gick MARK M GIESE

A-90-16

1249 Anthony Ad. Portsmosth, RIONS Ictober 23, 1990

Doar Mr. Keilly,

Please do not approve the gasoline additive "HiTce 3000". I think enough is it known about how dangerous manganese May be to over health-yours, mine and our fids

Also, I attended your Save The Bay address in Newport, months ago, and have meent to write to you ever since then. You are doing a great job, hang in there! washington noods someone like you doing this very tough job and Ihope George Fush appreciates you.

Thank you.

Sincerely, Sara Month

Del 22,1990

William K Railly
EPA

401. M. Street SW
Washington DO 20460

request for approval to add manganese to gasoline. We do not need more stopic heavy metal added to our enveronment.

Thank you.

Janitle King 4205 Colgate Way Levermore C Ca 94550



St. Mark's United Methodist Church

901 Stormont Avenue PRINCETON, INDIANA 47670

REV. BARBARA PLANCK (812) 385-3592

Church (812) 385-5425

21 October 1990

Dear Mr. Reilly:

With the little that is known, with the lot that is unknown, and all the trouble we are going through with leaded gas, I am appalled that we are considering adding manganese to be released in unnatural amounts in our environment.

I am very much opposed to allowing the Ethyl Corporation to carry out their plans for use of "HiTec 3000" as a gasoline additive. I strongly urge you to deny their request.

Most sincerely,

Barbara Planck

October 21, 1990

The Honorable William K. Reilly, Administrator Environmental Protection Agency Washington, DC 20460

The history of this country's addiction to cars includes the battle for removal of most lead from gasoline. This was accomplished only after prolonged debate and litigation. We now have the challenge of cleaning up the residues of lead fallout from playgrounds, roadsides and backyards in America. Other countries face this same challenge.

We now have the same company which introduced lead as an additive touting methcyclopentadienyl manganese tricarbonyl (MMT) as an additive which can reduce tailpipe emissions. The Fthyl Company is using the same persuasive argument as with lead that ". . . the manganese releases to the environment will be insignificant and that manganese is only toxic at high doses in industrial settings".

I urge you to reject the application by the Ethyl Company to use MMT.

I urge you also to suspend all currently permitted use of manganese as a gasoline additive in the United States.

Further, as Administrator of the EPA, I believe it is urgent that you help toward the establishment of a comprehensive energy plan, and support of auto fuel efficiency legislation as the first step toward ending our oil addiction. Our problem is not imported oil, but our dependence on oil itself.

This country has been operating without <u>any</u> plan to conserve energy. It is time for all of us to bite the bullet.

Laura A. Harders

4505 152nd Lane SE, Bellevue, Wa 98006

) faiders

cc] The White House Senators ADams and Gorton Rep. Rod Chandler

BREVIS

357 B OBISPO AVENUE . LONG BEACH, CALIFORNIA 90814 . (213) 439-8603

21 October 1990

Administrator William K Reilly ENVIRONMENTAL PROTECTION AGENCY 401 M Street SW Washington DC 20460

Re: HiTec 3000

Dear Administrator Reilly:

I am writing to urge that the EPA not approve Ethyl Corporation's proposed gasoline additive, HiTec 3000.

HiTec 3000 contains manganese, a toxic heavy metal. Added to gas, it would be released into our already polluted atmosphere in huge amounts. The EPA should deny Ethyl Corporation's application simply on the basis that the long-term health effects of manganese are unknown. Logic dictates that a substance known to produce symptoms of Parkinson's disease at high doses should not be introduced into the atmosphere at large.

Our air cannot sustain further insult. It bears as much poison as we can stand. Considering the danger manganese poses in and of itself, let alone in synergistic combination with all the other pollutants we belch into our atmosphere, the EPA should deny Ethyl Corporation's application for HiTec 3000.

Very truly yours,

Joan Hemphill

1810 Michigan Avenue Miami Beach, Fl. 33139

Administrator William K. Reilly Environmental Protection Agency 401 M Street, SW Washington, D.C. 20460

Dear Administrator Reilly,

As an environmentalist and an active member of the Environmental Defense Fund, I strongly urge you to deny Ethyl Corporation's application for "HiTec 2000", a toxic manganese-based gasoline additive.

Sincerely,

Rita Starr

October 23, 1990

1716 N. Danville Street Arlington, VA 22201

Mr. William K. Reilly Administrator Environmental Protection Agency 401 M Street, SW Washington, DC 20460

Dear Mr. Reilly:

I recently became aware of an initiative by the Ethyl Corporation to obtain EPA's approval of HiTec 3000, a gasoline additive. Ethyl is waging a massive ad campaign touting the substance's safety and environmental benefits.

In reality, HiTec 3000 contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. Adding HiTec 3000 to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

Ethyl Corp. is the same company which championed the use of leaded gas beginning in the 1920's. Let's not repeat history. Please do not allow EPA to approve this dangerous substance for use.

Thank you for your consideration.

Very truly yours,

usa hidlade

File - ENV-11

6276 Cobey Lane Mariposa, CA. 95338 20 October 1990

William K. Reilly - Administrator Environmental Protection Agency 401 M Street, SW Washington, D.C. 20460

Dear Mr. Reilly,

I urge you to deny the application of the Ethyl Corporation to introduce a Manganese based gasoline additive. At this time, it is known that Manganese, in high doses, produces symptoms of Parkinson's disease. The effects of long term, low dose exposure are not known at present. However, the use of high dosages over a short period are usually considered to be indicative of the results to be expected from long term, low dose exposures. In the absence of convincing data on long term exposures, it is better to err on the side of caution. The history of long term exposure to lead, as a gasoline additive, provides a cautionary example.

Sincerely,

Richard W. Kunstman

October 21, 1990

William K. Reilly Environmental Protection Agency 401 M Street SW Washington, DC 20460

Dear Mr. Reilly,

I am writing to you today to express my outrage over the EPA's decision to even consider the possibility of introducing another heavy metal into our environment as a gasoline additive. I am speaking of the Ethyl Corporation of America's attempt to gain approval of "HiTec 3000" or MMT. As you know, this additive contains manganese, which at high doses is a demonstrated human neurotoxin with persistent and irreversible pathological effects on brain structure. The results are severe impairments in movement and mental states in humans.

Mr. Reilly, we do not know what the long-term chronic, low-dose effects of human exposure to manganese are. We do not know what a "safe" level of manganese exposure is, particularly for children, pregnant women and the elderly.

The American public cannot afford to play Russian roulette with its health once again. Have we learned nothing from our disastrous experience with lead (another heavy metal) additives to gasoline, also introduced by the Ethyl Corporation? Ethyl knew of the hazardous potential of lead back in 1925, when 40 of its workers at its very first plant were struck with lead poisoning. Five men died from it. But Ethyl ignored this warning, proceeded with production and millions of tons of lead-leaden exhaust were pumped into the environment.

A repeat of this catastrophe is unacceptable. There's no reason to open our environment to another health hazard. Do you want your children and grandchildren ingesting lead (and manganese) from dust and dirt in yards and playgrounds across America (while they are innocently having a good time)? You know where this lead came fromfrom the exhaust pipes of cars burning leaded gas over the past 65 years.

For our children's future, our future and in the name of common good sense, I strongly urge you to deny Ethyl Corporation's application for "HiTec 3000." Do not allow any manganese additives into our gas supply.

A loyal American

Benjamin a. Tiemer

OCTOBER 21, 1990.

WILLIAM K. REILLY, ADMINISTRATOR ENVIRONMENTAL PROTECTION AGENCY, 401 M STREET, SW WASHINGTON, DC 20460

DEAD MR. BEILY:

I AM RESPONDING TO PUBLISH, REPORTS THAT ETHYL CORP. 19 APPLYING TO LIGE A MADIGANESE-BASED (TOXIC HEAVY METAL) COMPOUND AS A GASOLINE ADDITIVE.

WE CAN NOT ALLOW ETHYL CORPORATION PUT ANOTHER HIGHLY TOXIC SUBSTANCE IN OUR VERY FRAGILE ENVIRONMENT. AND THIS IS CLEARLY AN OPPORTUNITY FOR A NEW HEALTH HAZARD, ONE WE SHOULD NOT TOLERATE.

I WRITE TO YOU AS A CONCERNED PERSON, WHO OWNS AN AUTOMOBILE AND LIVES IN AN URBAN CITY. I'VE TAKEN THE TIME TO EXPRESS MY CONCERN. I ALSO SUPPORT THE PUBLIC AWATENESS EFFORT OF THE ENVIRONMENTAL DEFENSE FUND.

SINCEPELY,

Blen Friedman.

C.C. ENVIRONMENTAL DEFENSE FUND.

ELLEN FRIEDMAN, ARCHITECT- 55 PERRY ST., NEW YORK NY 10014.

RACHEL MARTA GREENBERG 1350 Commonwealth Avenue Allston, MA 02134

October 19, 1990

William K. Reilly Administrator Environmental Protection Agency 401 M Street, S.W. Washington, DC 20460

Re: Gasoline Additive HiTec 3000

Rachel Marta Greenling

Dear Mr. Reilly:

I was very concerned when I read yesterday that the Ethyl Corporation of America is asking the EPA to approve a gasoline additive called HiTec 3000. This additive contains a toxic heavy metal - manganese. This is not a safe additive and should not be added to our gasoline.

Our world is at an environmental crossroads. Either we continue as we have and ultimately self-destruct, or we carefully evaluate each new technological breakthrough for its long-term effects before we put a product on the market for large scale use.

Please <u>do not approve</u> HiTec 3000. The risks are too great for human health and environmental damage. The new auto fuels should be cleaner, and more efficient in burning. This is not one of them.

Sincerely,

rmg

Pleasant Hill Tn. P.O. Box 149, 38578

Oct.22, 1990

Administrator William K. Reilly Environmental Protection Agency Washington D.C.

Dear Mr. Reilly:

I write to you as a retired physician to express my concern on the proposal by the Ethyl Corporation to approve use of "HiTec 3000" as a gasoline additive.

HiTec 3000 contains manganese which is a heavy metal which if released into the environment may produce effects on human health. The effects of such material is not known. We only have to look back on the problems we had with lead poisoning especially with children. As a physician who dealt with those problems I believe this manganese product should not be used until proven safe!

Respectfully,

Frederick W. Munson M.D.

Mr. William K. Leilly Cla administrator Washington, D.e. 20460

10/20/90

Dear Phr. Reilly:

I have electly liven made aware that the thy Corporation is seeking to introduce a new gasoline, "the Dec 3,000", into the U.S. consumer market. From what of know, the chemical additives that comprise this fuel (MMT) have not been fully tested

for their caranogenic dangers.

intile there is evidence that MMT is harmful to humans, I believe that wide spread usage of this fiel should NOT be allowed until testing is complete.

Therefore, please reject Othyl Corporation's application to use MMT in their "environmentally safe" gasoline. He U.S. public describes the respect.

Manle you for your support on their Gan. succeepy,

> the Camentaum
>
> P.O. BOX 123 Brookside, N. J. 07926

Dr. Mha Atma Singh Khalsa 1536 Crest Drive Los Angeles, CA 90035

William Reilly, Administrator Environmental Protection Agency 401 M Street SW Washington, D.C. 20460

Dear Mr. Reilly,

Ethyl Corporation's application to the EPA for approval of "HiTec 3000" should be denied. This new gasoline additive, touted by Ethyl as "environmentally safe," contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unkown.

Ethyl Corporation's last experimental exposure of the entire population of our nation to a toxic heavy metal began in 1925, when they were the first to champion the use of lead additives in gasoline. Leaded gas has, in the last 65 years, been a major contributing cause of chronic lead poisoning in millions of children around the world.

Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! I strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Most sincerely,

Dr. Mha Atma Singh Khalsa

Ms. Terry Maderak 4542 S. Spaulding Chicago, IL 60632

October 19, 1990

William K. Reilly Administrator Environmental Protection Agency 401 M Street, SW Washington, DC 20460

Dear Mr. Reilly:

As an environmentalist and an active member of the Environmental Defense Fund, I strongly urge you to deny Ethyl Corporation's application for "HiTec 3000", a toxic manganese-based gasoline additive.

The Ethyl Corporation CANNOT put another toxic heavy metal additive in our gasoline! There is NO reason to open our environment to a new health hazard. We CANNOT tolerate future unknown clean-up costs when this problem is altogether PREVENTABLE TODAY.

Ethyl Corporation managed to fool the public once...and the resulting damage to the environment and public health, much of it irreparable, is done. All we can say now is "Shame on them".

BUT IF WE LET THEM DO IT AGAIN, SHAME ON US!!!

Sincerely,

Ms. Terry Maderak

October 21, 1990

Mr. William K. Reilly, Administrator Environmental Protection Agency 401 'M' Street, S.W. Washington, D.C. 20460

RE: Ethyl Corporation's HiTec 3000

Dear Mr. Reilly:

I am writing you to inform you that I do not want a repeat of the 1925 scandal, where the Ethyl Corporation introduced lead based additives for gasoline, poisoning millions of innocent children around the globe. The Ethyl Corporation, again, has plans to use the American public as guinea pigs for their new chemical gasoline additive, "HiTec 3000". This chemical additive contains the toxic heavy metal, maganese, which is known to cause symptoms of Parkinson's Disease at high doses. Who knows what the long-term effects may be on humans. I hope that you will not permit this potential catastrophe.

I thank you for your anticipated immediate attention to this matter.

Hopefully yours,

Richard S. Casper

Environmental Engineer

Oct. 18, 1990

Dear Administrator Reilly,

As an environmentalist and an active member of the Environmental Defense Fund, I strongly urge you to deny Ethyl Corporations application for "Hitec 3000", a toxic manganese-based gaso-line additive.

Sincerely,

Kathleen Rahmour

A concerned citizen

P.S. Please see the enclosed article about gasoline additive mething-cyclopentadienyl manganese tricar bonyl (MMT)? Please deny production of it? Or addition of it to gasoline?



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A New Idea from the Folks Who Gave Us Leaded Gas

By EDF toxicologist Dr. Ellen K. Silbergeld, who was the only environmentalist to appear before the Environmental Protection Agency (EPA) to urge rejection of an application to use a manganese-based compound as a gasoline additive.

n 1925, the Ethyl Corporation introduced its new gasoline additive, tetraethyl lead, as "a gift of God." It took us over 50 years to realize how diabolical this "gift" proved to be. The hard-won



ELLEN K. SILBERGELD

removal of most lead from gasoline represents one of EPA's most significant public health achievements. I am proud to have participated with EDF in that victory.

Now, in 1990, Ethyl comes bearing yet another gift, methycyclopentadienyl

manganese tricarbonyl (MMT), and asks EPA to approve it as an octane-enhancing gasoline additive. To this offering, EPA must just say "No."

Lead poisoning is an epidemic in the U.S. Even after considerable reductions

Amazingly, in light of the history of leaded gasoline, Ethyl finds it unnecessary to do anything more in 1990 than it did in 1925.

have been imposed on the use of lead in gasoline-only after prolonged debate and litigation, it should be noted-we are just now confronting the extraordinarily difficult challenge of cleaning up the residues of lead fallout from playgrounds, roadsides, and backyards in America.

The parallels between Ethyl's 1990 proposal to use manganese and its 1925 lead proposal are chilling. The exclusive justification for each additive is its purported effect on emissions of hydrocarbons and nitrous oxides from cars. No data were or are given on the potential cumulative health effects of massive inputs of a toxic metal into the environment, its deposition on surface dusts and soils, or its long-term fate and pathways of exposure to humans.

In 1925, Ethyl argued that the amounts of lead to be added to gasoline were negligible and that lead was only toxic at the high doses encountered in certain industrial settings. In 1990, it argues that



With ever-increasing numbers of cars on the road, manganese added to gasoline wouldlike lead-accumulate in the environment with potentially tragic results, particularly in urban areas.

the manganese releases to the environment will be insignificant and that manganese is only toxic at high doses in industrial settings.

In both cases, the critical national importance of accepting Ethyl's additive is argued. In a well-funded ad campaign claiming that MMT can reduce tailpipe emissions, Ethyl is seeking to exploit public concern over pollutants in global and local air. The purported reductions, if any, are very small and are overwhelmed by the health costs of exposure to manganese.

Amazingly, in light of the history of leaded gasoline, Ethyl finds it unnecessary to do anything more in 1990 than it did in 1925. Ignoring contrary evidence, it selectively cites bits of data to support its contention that the use of MMT will not increase airborne manganese concentrations over cities, and provides no data on the impacts of manganese additives on manganese levels in other parts of the environment. It presents no in-depth review of the health effects of manganese, nor-more important-any discussion of critical gaps in the data about manganese toxicity that must be filled before a decision that could release many thousands of tons of manganese to the environment can be approved.

The data on manganese are relatively sparse compared to lead-we have not yet conducted a massive human experi-

ment with manganese. But both what we know and what we do not know about the likely toxic effects of adding large amounts of manganese to the environment must persuade EPA to reject this application.

We know that manganese at high dose is a demonstrated human neurotoxin, with persistent and irreversible pathological effects on brain structure and resulting severe impairments in movement and mental state. We have indications that manganese may also selectively affect the fetus, the young, and the aged.

We do not know what the long-term chronic, low-dose effects of human exposure to manganese are. We do not know what a "safe" level of manganese exposure is, particularly for the young or the aged who may be at increased risk. We do not know if manganese is carcinogenic, although there is evidence that it can break DNA, which may indicate cancercausing potential.

But from our tragic experience with lead, we know a great deal about the likely cumulative effects of such a use upon human exposure. We know that the gradual contamination of the environment by manganese will not be readily reversed. We know that manganese will

Society cannot afford to repeat the public health catastrophe associated with the use of lead in gasoline.

accumulate in many places-particularly in urban dusts and soils—that are subject to intensive human interaction and that will be sources of direct human exposure to manganese.

We rarely have an opportunity to apply the clear lessons of 50 years of very similar experience. To disregard these lessons by approving the widespread and inevitably dispersive use of manganese would be to invite repetition of the public health catastrophe associated with the use of lead as a gasoline additive since 1925. Society cannot afford such a repetition. EDF is urging EPA to reject this new application and immediately suspend all currently permitted use of manganese as a gasoline additive in the United States.

EDF MEMBER ACTION ALERT

Concerned members can help by writing to EPA Administrator William K. Reilly (Washington, DC 20460) urging him to reject Ethyl's application to use MMT.

To EDF Member-

Ma Kathleen Rahmoun 1334 W Columbia Ave CHICAGO IL 60626-4326

Membership No:

04651069

ABFN4A

Dear	Ms. Rahmoun:
sign o	I am inviting you as one of a select group of EDF's most active members to un "Open Letter to the EPA" urging that EPA deny the Ethyl Corporation's ation for "HiTec 3000," a toxic manganese-based gasoline additive.
respoi	I need to receive your answer by October 29 to meet the advertising deadline. Pleas and immediately.
•	
	Fred Brygo
	YES, Fred, I accept your invitation to sign on to EDF's Open Letter advertisement protesting Ethyl Corporation's "HiTec 3000" proposal, which would release large quantities of manganese into the environment.
	I am enclosing the following tax-deductible gift to support the cost of the ad as well as EDF's scientific work on this critical manganese campaign and other efforts to protect the environment:
1	□ \$100 □ \$50 *□ \$35 □ \$20
	*A gift at this level or higher will move your name to a more prominent position in the ad under the banner "Member Leadership Committee on Manganese."
	Your name will appear as follows: (make any corrections needed) Mark Kathleen Rahmoun
	The ad will include the Open Letter (below), the names of all participating members deed technical information on the issue see the other side of this page for an advance LETTER column on Ethyl Corporation's proposal.
	(This advertisement paid for by the undersigned members of the Environmental Defense Fund)
A	OPEN LETTER TO WILLIAM K. REILLY DMINISTRATOR, UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
	Dear Administrator Reilly,
	As an environmentalist and an active member of the Environmental Defense Fund, I strongly urge you to deny Ethyl Corporation's application for "HiTec 3000," a toxic manganese-based gasoline additive.
1	Sincerely,
	The Undersigned Members of the Environmental Defense Fund

following tax-deductible gift in support of EDF's efforts:

October 19, 1990

Mr. William K. Reilly, Administrator Environmental Protection Agency 401 M Street, SW Washington, DC 20460

Dear Sir:

Rather than write you a long letter, I hope you will take a moment to read the enclosed article concerning Ethyl Corporation's gas additive product, MMT (or Hi-Tec 3000).

In my opinion, Ethyl's public relations campaign to dupe the public and policymakers about this product is criminal.

Please, when you consider this issue, place the health of Americans and the integrity of our environment above corporate profits.

I urge you to deny Ethyl's application for the Hi-Tec 3000 additive.

Sincerely,

Bruce Thomas 5 Banyan Ct.

St. Peters, MO 63376

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October 21,1990.

Mr. William K. Reilly EPA Administrator Washington, DC 20460

Dear Administrator Reilly,

As an environmentalist and active member of the Environmental Defense Fund, I strongly urge you to dony Ethyl Corporation's application for "HiTec 3000" a toxic manganese - based gasoline additive.

Sinierely,

Cht F. Plan

willian K. Delly EPA Washington, D. 20460

Dear Mr. Reilly,

I am writing to urge you to reject the Ethyl (or poration's application to use MMT (containing manganese) in its gasoline. There is no reason to introduce another heavy metal into the combustion by products of gasoline. We're succeeded in removing lead from most gasoline cand now must concentrate an cleaning up and regulating the rest of the airborne pollutants regulating the rest of the airborne pollutants

t trust you will decide in favor of the health and safety of the American people, wildlife and plants and reject Ethyl's application.

I am looking forward to hearing your reply.

Sincerely. Alison Conant. ADDISON M. PARKER
1600 HUB TOWER
699 WALNUT STREET
DES MOINES, IOWA 50309

October 19, 1990

Mr. William K. Reilly Administrator Environmental Protection Agency 401 M Street, S.W. Washington, D. C. 20460

Re: Manganese Additive to Gasoline

Dear Mr. Reilly:

Ethyl Corporation, I understand, seeks EPA's permission to add MMT, a manganese derivative, to gasoline as an asserted anti-pollutant. In fact, the anti-pollutant effect of MMT on tailpipe emissions is negligible. On the other hand, manganese is a neurotoxin, at least at high doses, particularly may affect the elderly, the very young and the fetus, and may severely impair mind and movement.

Although lead was a known poison, long-time exposures to tetraethyl lead in very small quantities were, doubtless, thought harmless. We have virtually stopped those exposures because experience taught the contrary.

Just as was the case with tetraethyl lead when introduced, we now have no knowledge of the long-time effects of exposure to small amounts of the manganese compound. For that very reason, we should apply the lesson learned with tetraethyl lead and not permit the risk to the public from a derivative of a heavy metal known to be dangerous.

Very truly yours,

Addison M. Parker

AMP:caa

OCT. 23,1980

DEAR SIR:

THIS NUTE IS AN APPEAL TO YOU TO DENY
THE ETHYL CORPORATION'S REQUEST FOR APPROVAL
OF THE GASOLINE APPITIVE "HI-TEC 3000", THE
IDEA OF REPLACING ONE TOXIC POLLUTANT (MANGANESE)
ANT (LEAD) WITH ANOTER TOXIC POLLUTANT (MANGANESE)
MAKES NO SENSE TO ME, I WOULD HOPE THE DEP
WOULD GIVE SERIOUS THOUGHT TO THE POSSIBLE
LONG TERM CONSEQUINCES OF APPROVINCE THE
USE OF "HI-TEC 3000".

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VERT TRUCT YOURS,

Richard G. Bray

October 19, 1990

Dear Mr. Reilly:

Am writing to urge you to avoid falling into a trap of approving the additive "HiTee 3000" into our fuel supplies. After the additive of lead in 1925 our environment deteriorated rapidly. This new 'ploy will be even worse if approved. You know better than I of the hazards. We must not prejudice the health of present and future generations by further deterioration of our environment. Please do everything in your power to stop this new encroachment on our health and environment. Thank you

Sincerely, () (Still Still Silvery)

Bill Stewart R.R.1 Box 328

Maquoketa, IA 52060

N. G. Cole Rt. 86 Unit 17 Box 8 Monticello, Kentucky 42633

Administrator William K. Reilly Environmental Protection Agency 401 M Street, SW: Washington DC 20460

Dear Mr. Reilly With our present dirty air + all
With our present dirty air + all
the related pro blems in getting it cleaned
Up, I cont believe the EPA would
consider another addition in
Gasolone and this one a toxic heavy
metal.

I protest

Sincère ly Norma Cole